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IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division

UNITED STATES OF AMERICA

v.

STACEY STOREY,

Defendant.

Case No. 2:24cr103

STATEMENT OF FACTS

The United States and the defendant, STACEY STOREY (hereinafter, STOREY or "the defendant"), agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

- 1. Beginning on an unknown date but no later than August 2021, and continuing through on or about July 7, 2022, in the Eastern District of Virginia and elsewhere, defendant STACEY STOREY, together with others known and unknown, did unlawfully and knowingly combine, confederate, conspire, and agree to commit the following offenses against the United States:
 - a. <u>Creation of Animal Crush Videos</u>: knowingly created at least one animal crush video, as that term is defined in Title 18, United States Code, Section 48(f)(2), and intended and had reason to know that the animal crush video would be distributed in and using a means and facility of interstate and foreign commerce, and the animal crush video was distributed in and using a means and facility of interstate and foreign commerce.
 - b. <u>Distribution of Animal Crush Videos</u>: knowingly sold, marketed, advertised, exchanged, and distributed an animal crush video in and using a means and facility of interstate and foreign commerce.

THE OBJECT OF THE CONSPIRACY

2. The object of the conspiracy was for the conspirators to promote, create, obtain, and distribute animal crush videos using videographers and animals in other countries, to include Indonesia, which would then be sent to the United States.

THE WAYS, MANNER, AND MEANS OF CONSPIRACY

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

- 3. It was part of this conspiracy for defendant STACEY STOREY and coconspirators to administer a private online chat group and be a member of other private online chat groups ("Groups") on an encrypted messaging platform, the purpose of which was to fund, view, distribute, and promote animal crush videos depicting, among other things, the torture, murder, and sexually sadistic mutilation of animals, specifically, juvenile and adult monkeys.
- 4. It was part of this conspiracy for defendant STACEY STOREY and coconspirators to collectively fund the creation of animal crush videos using online payment applications.
- 5. It was part of this conspiracy for coconspirators outside of the United States to receive this funding and use it to procure recording devices and animals for the creation of animal crush videos.
- 6. It was part of this conspiracy for coconspirators outside of the United States, including adult and juvenile individuals, to torture, perform sexually sadistic mutilation, and murder these animals and to video record such acts, thereby creating animal crush videos.
- 7. It was part of this conspiracy for coconspirators outside of the United States to transmit animal crush videos to coconspirators within the United States, some of whom were

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members of the Groups, who would then distribute them to the broader Groups, to include defendant STACEY STOREY.

OVERT ACTS

In furtherance of this conspiracy, and to effect and accomplish its objectives, defendant STACEY STOREY and other coconspirators committed one or more of the following overt acts:

- 1. Beginning on an unknown date but no later than August 22, 2021, and continuing through on or about July 7, 2022, defendant STACEY STOREY received hundreds of electronic payments over the Internet from coconspirators, including CC12, totaling over \$2,800, for the purposes of funding, among other things, payments to animal crush videographers that lived outside of the United States, including Indonesia, to create new animal crush videos.
- 2. STOREY, Coconspirator 13 (CC13), and others had direct communications with Coconspirator 11 (CC11) in Indonesia. CC11 lived in Indonesia and hired the videographers to create new animal crush videos to send to the coconspirators. STOREY, CC13, and others routinely directed and paid CC11 for the creation of animal crush videos from the funds they received from coconspirators. STOREY, CC13, and others would direct the videographers how to torture the animals in the videos.
- 3. In addition, between in or about March 2022 and July 2022, defendant STACEY STOREY sent numerous payments to CC13 totaling over \$2,200 for the purposes of funding payments to the animal crush videographers that lived in Indonesia to create new animal crush videos and send the videos to him and others.
- 4. As an example of how the conspiracy worked, on or about April 25, 2022, a member of the Groups submitted a message to the Groups referencing "the ants in a jar idea." Members of the Groups discussed sending in donations to produce videos that would be exclusive

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to the Groups. Approximately seventeen minutes later, Coconspirator 3 (C3) wrote "\$20 sent" and CC3 did, in fact, send \$20 to CC12 using an online application.

- 5. On or about June 21, 2022, STOREY distributed an animal crush video to the Groups, stating "Enjoy this one ladies and gents." STOREY also asked "If you guys would like to send in a small donation for this guy a little bonus for a job well done that we've always wanted to see would be absolutely amazing." The video STOREY distributed depicted the torture of a juvenile monkey using a jar of ants and sodomy with an object, causing the juvenile monkey's death.
- 6. Following the distribution of the video on June 21, 2022, members of the Groups expressed gratitude for the video and its specific contents, including the fact the jar of ants was used. Thereafter, CC3 wrote "I love how he had doubts but was able to make the ants request work on short notice." CC3 thereafter sent a bonus payment for the videographer using an online application, and stated "I happily threw some bonus bucks at the kid. We need to keep him happy and well fed."
 - 7. CC12 encouraged more donations to STOREY by stating:

Our group is allowed to give [STOREY] donations for her videos per the agreement her and I have between our two groups. She has my permission to put up her cashapp and PayPal info. She delivers great content to us. So feel free to donate to her. All I ask, is whoever does private message me with the amount you donated so I can keep track for our group. Thank you family.

- 8. CC12 lived in the Eastern District of Virginia during the conspiracy and participated in the conspiracy during its duration therefrom.
- 9. In June 2023, law enforcement seized STOREY's electronic devices. STOREY's electronic media and accounts contained over 675 videos and 11,000 images depicting animal

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crushing. including the above-described video depicting the torture of the juvenile monkey using a

jar of ants.

10. The distribution and creation of the videos necessarily utilized applications and

electronic media that used the Internet. The Internet is an interconnected network of computers

with which one communicates when on-line, is a network that crosses state and national borders,

and is a facility of interstate and foreign commerce.

11. The defendant knew that the videos described herein and other images involved in

this conduct were obscene.

12. The defendant's participation in the events described was undertaken knowingly,

intentionally, and unlawfully, and not as a result of an accident, mistake, or other innocent reason.

13. The defendant acknowledges that the foregoing statement of facts does not describe

all of the defendant's conduct relating to the offense charged in this case, nor does it identify all of

the persons with whom the defendant may have engaged in illegal activities.

Respectfully submitted,

Erik S. Siebert

United States Attorney

Date: January 30, 2025

By: ____

Elizabeth M. Yusi

Assistant United States Attorney

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After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, STACEY STOREY, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

STACEY STOREY

I am STACEY STOREY's attorney. I have carefully reviewed the above Statement of Facts with her. To my knowledge, her decision to stipulate to these facts is an informed and voluntary one.

Kim M. Crump, Esq.
Counsel for Defendant

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